

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

RÜMEYSA ÖZTÜRK, Petitioner,

v.

DONALD J. TRUMP, in his official capacity as President of the United States; PATRICIA HYDE, in her official capacity as the New England Field Office Director for U.S. Immigration and Customs Enforcement; MICHAEL KROL, in his official capacity as HSI New England Special Agent in Charge, U.S. Immigration and Customs Enforcement; TODD LYONS, in his official capacity as Acting Director, U.S. Immigration and Customs Enforcement; KRISTI NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; and MARCO RUBIO, in his official capacity as Secretary of State, Respondents

Case No. 2:25-cv-00374-WKS

**MOTION OF INTERNATIONAL LAW PROFESSORS, EXPERTS, PRACTITIONERS,
AND SCHOLARS FOR LEAVE TO FILE AN *AMICI CURIAE* BRIEF IN SUPPORT OF
PETITION FOR HABEAS CORPUS**

International law professors, experts, practitioners and scholars, listed in full below, respectfully move before the Honorable William K. Sessions III, United States District Judge at the U.S. District Courthouse, 11 Elmwood Avenue, Burlington, VT, for an order granting leave to file a brief *amicus curiae* in support of the Petitioner's First Amended Petition for Habeas Corpus in the above-captioned proceeding. Counsel for Petitioners and Respondents have been contacted.

Counsel for Petitioners do not take a position on this motion. As of this writing, counsel for Respondents have not provided their position on this motion.

INTEREST OF *AMICI CURIAE*

Amici curiae are international law and human rights professors, experts, practitioners, and scholars. *Amici* respectfully submit this brief to provide the Court with analysis of the issues at stake in this case under relevant international law. The analysis provided in this brief is relevant to the outcome of the case and wholly distinct from the legal analysis presented by the parties, as it focuses on international legal standards that require the United States to respect the rights to freedom of opinion and expression, and the limited ways in which such rights may be restricted. *Amici* have a strong interest in the outcome of this case and its impacts on human rights. *Amici* are profoundly concerned that this case threatens universal human rights protected by international law, including the rights to opinion and expression on a nondiscriminatory basis. Some *Amici* themselves fear retaliation for exercising these rights, including in relation to signing onto this amicus. *Amici* know other similarly qualified individuals who wanted to join in this brief, but felt that they could not do so for fear of retaliation, including arrest or deportation.

LIST OF *AMICI*¹

The positions taken in this brief are those of *amici* alone and should not be attributed to any institution with which amici are or have been affiliated.

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¹ Institutional affiliation is provided for identification purposes only. The positions taken in this brief are those of amici alone and should not be attributed to any institution with which amici are or have been affiliated.

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Respectfully submitted

DATED: April 10, 2025

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